

15 November 2025

To: Charter Reform Commission
Planning & Infrastructure Committee
Meeting to be held 18 Aug 2025 at 3 pm
ReformLAcharter@lacity.org

Re: **Historic Preservation**

Dear Commissioners and Committee Members,

Thank you for this opportunity to provide input to the City Charter reform process. You have received comments from the City Planning Department as to how their operations can be improved (letter from Director of Planning to Commission dated 21 August 2025). While I support efforts to improve City operations, I do not agree with their proposed plan to place all decision making into the hands of the Director.

City Planning is responsible for the designation of buildings found to be historically or culturally significant. Designation is currently a complex process that is inefficient, costly, and time consuming. For a potentially significant building under the threat of demolition, the process does not work. Rather than delay demolition so that the building can be assessed properly, City Planning refuses to accept applications from the public. This action gives project proponents seeking to demolish a building a right that does not exist.

City Planning policy established the procedure by which buildings can be designated as historic. And now, when the public follows their procedure, the public is chastised for acting too late. When the public complains about preservation laws not being followed, City Planning either ignores the complaint or misquotes the law.

Overall, we need to streamline the historic designation process, improve transparency, and remove the politicized agenda that favors developers over the public. In seeking a viable solution, I propose that the City Charter be amended to **restore all decision-making authority to the Cultural Heritage Commission**.

Los Angeles once led the nation with its progressive historic preservation program. Decisions made by the CHB/CHC were not subject to revision or modification by unqualified politicians. Cities with independent boards or commissions include San Francisco, New York, Boston, Chicago, and Philadelphia. It's time for Los Angeles to restore our once "best-in-class" program by returning sole historic designation authority to the CHC.

In closing, thank you again for this opportunity to comment. I have attached additional material and background information for your review.

Respectfully,

Michael Callahan, P.E.

BACKGROUND

The City of Los Angeles Cultural Heritage Board (CHB) was created in January 1962 in response to the pending demolition of several historic buildings. Upon creation, the Board had the sole authority to designate a site, building, or structure an Historic-Cultural Monument (HCM) due to its architectural, historical, or cultural significance.

Today, historic designation and preservation fall under the domain of the Cultural Heritage Commission (CHC) and its Office of Historic Resources (OHR), both under the Department of City Planning. An HCM application approved by the CHC must also undergo approval by the Planning and Land Use Management (PLUM) Committee and by City Council prior to being added to the official register. In becoming a commission, the CHB lost its sole authority and became an advisory agency.

THE HCM PROCESS

Anyone can nominate an eligible building, object, site, or structure. The term “eligible” typically means that the building, object, site, or structure is more than 45 years old, and it possesses some elements that either distinguish its period of significance or its relationship to someone or an event of importance.

The road to designation involves seven steps as I have adapted from the “[Historic-Cultural Monument Nomination Information Guide](#),” City of Los Angeles Office of Historic Resources and Cultural Heritage Commission, Updated April 2018.

- STEP 1: Upon receipt, the Office of Historic Resources (OHR) reviews the [HCM application](#) for completion. An application deemed complete must provide sufficient evidence and necessary documentation. If no additional materials are needed, OHR prepares an initial staff report for the Cultural Heritage Commission (CHC).
- STEP 2: CHC holds a public hearing during which it will vote on whether it will formally begin the HCM review process. The applicant may be present to speak and provide a brief photo slideshow. If the CHC votes to take the nomination under consideration, the application process formally begins.
- STEP 3: OHR will formally notify the property owner about the nomination. Additionally, a temporary stay will be placed on demolition or substantial alteration permits. The stay remains while the property undergoes review.
- STEP 4: OHR evaluates the proposed monument for designation and may conduct a site visit. After evaluating the property, OHR prepares a final staff report to the CHC recommending approval or denial of HCM designation.
- STEP 5: CHC holds a second public hearing during which it will vote to approve or deny HCM status. If denied by CHC, the designation process ends and the stay on demolition or alteration is lifted. If approved, the nomination is forwarded to the City Council’s Planning and Land Use Management (PLUM) Committee.

STEP 6: The PLUM Committee holds an initial hearing to recommend approval or denial for consideration by the full City Council. The nomination may also be referred back to OHR for additional review and investigation.

STEP 7: The City Council grants the property, site, or structure inclusion on the list of HCM's. Note: City Council, and the PLUM Committee, seldom reject an HCM nomination, but they can reduce or alter the scope of the designation.

Nominating a building is a daunting task for members of the public. OHR requires a large amount of data and material to be compiled and presented before they consider the application to be complete. This review process can take months. The applicant must attend multiple hearings, in front of different city entities. The nomination process can be time-consuming and costly, with no assurance that the nomination will succeed.

In addition, OHR/CHC interpretation of recent changes in land use law is resulting in their refusal to accept nominations if a demolition permit has been filed. City Ordinance requires the posting of demolition notices so that the public has time to file a nomination, and now, OHR/CHC publicly chastises people for trying to follow the procedure that was enacted by city ordinance.

A SOLUTION FORWARD

Historic preservation in the city of San Francisco was once managed by their Landmarks Preservation Advisory Board (LPAB)¹. LPAB recommendations were sent to the Planning Commission for review and approval where they were not always accepted. Applicants were required to prepare for and attend two hearings instead of one (note: in Los Angeles, applicants are required to attend a minimum of four hearings, if their application is accepted).

To streamline the historic designation process, San Francisco voters approved Proposition J in the year 2008. Proposition J amended the SF City Charter, replacing the advisory LPAB with an independent Historic Preservation Commission (HPC). The HPC meets the requirements of the National Park Service's Certified Local Government (CLG) program, thereby making SF eligible for CLG preservation grants.

With autonomous authority, the HPC is highly protective of historic buildings. City Planning is currently conducting extensive surveys to identify historic buildings and the HPC will use their authority to landmark those buildings². This is a more efficient approach than requiring citizens to compile an extensive report for each building, a report that can be modified or ignored as the nomination moves from the Los Angeles CHC, to PLUM, and to City Council.

In addition, the HPC has the authority to approve or reject a building permit for the alteration of a designated historic building. The recent presentation by SF City Planning clearly calls out the prohibition of demolishing a historic building. To develop a historic building for housing, the

¹ Information presented is based on letter by Bridget Maley to the San Francisco Commission Streamlining Task Force dated 30 September 2025 (copy attached).

² Presentation by San Francisco Planning entitled "San Francisco Family Zoning Plan, Housing Element Rezoning," to the Historic Preservation Commission dated 20 August 2025 (extract attached).

only acceptable approach is adaptive reuse. While LA City Planning has published a guideline for adaptive reuse, no effort is made to promote or enforce adaptive reuse.

Also of interest, the SF City Planning presentation uses District 8 in their discussion of measures to ensure historic building protection. Senator Scott Weiner formerly represented District 8. Scott Weiner is the author of several successful State bills that promote housing over historic preservation. How is it that SF City Planning can promote historic preservation in spite of recent housing laws while LA City Planning uses these same laws as an excuse not to act?

In closing, to better promote historic preservation, to reduce the burden placed on citizens having to file extensive HCM applications, and to remove politics from the process, the City Charter must be amended to return autonomous authority to the CHC. The CHC is the only group within City Planning with the unique qualifications to decide if a building is historic. The members of PLUM and the City Council are not qualified, and both have a history of letting politics decide the outcome. Such actions by PLUM and City Council make a mockery of our historic preservation program. Amend the City Charter and restore power to the CHC.



September 30, 2025

Commission Streamlining Task Force
San Francisco City Hall

RE: Historic Preservation Commission

Dear Commission Task Force Members Hayward, Mihal, Bruss, Harrington and Kittler:

I write in support of maintaining the Historic Preservation Commission (HPC) as a decision-making body. I was a member of the predecessor body to the HPC, the Landmarks Preservation Advisory Board (LPAB), appointed by Mayor Newsom. I also served as President of the LPAB.

The City's LPAB, established in 1967, was a relatively early preservation review body in the U.S., but by the late 1990s, the LPAB was anachronistic for a city the size, significance, and urban quality of San Francisco. The LPAB recommendations were sent to the Planning Commission for review and approval. However, often the recommendations of the LPAB were not accepted by the Planning Commission. Further, applicants were required to prepare for and attend two hearings instead of one, efficient hearing and decision. In short, reverting to an advisory body rather than a decision-making Commission, will not only result in an increase in the work of the Planning Commission, but also that of Planning Department staff.

It was in recognition of this reality and specifically to streamline approval processes that San Francisco voters approved Proposition J, creating the HPC in 2008 through a Charter Amendment. I am attaching the ballot arguments from that election. Please note that there was NO opposition to Proposition J. I encourage you to read the ballot arguments carefully and note that one key purpose of the proposition was to streamline decision-making. It should be noted that 56% of the city's voters approved Proposition J, making the HPC a decision-making body, and that it was approved in all but two supervisorial districts.

The HPC meets the National Park Service's Certified Local Government (CLG) program (as per the National Historic Preservation Act of 1966, amended in 1980). The most significant changes between the LPAB and the HPC were the following:

- Commission members are required to have specific professional qualifications;
- Commission approval of permits for the alteration of designated historic buildings; and
- Commission ability to offer recommendations regarding proposed ordinances and resolutions concerning historic resources



Commission Streamlining Task Force

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September 30, 2025

These changes, as outlined by the Certified Local Government (CLG) program, brought expertise to the disposition of historic resources, thereby making planning and development review and decision making better informed and more efficient. California has over 60 CLGs and it is a popular, valued program of the National Park Service, providing significant funding and program assistance to those local governments. In six of the last 12 years, the San Francisco Planning Department has been awarded substantial grants through the CLG program.

I urge this Task Force to retain the HPC as a decision-making body and to call on experts with knowledge of historic preservation law, policy, and practice to help inform your evaluation and recommendations.

If you follow through, and change the nature of the HPC, you will be acting directly against the will of San Francisco voters, increasing the workload of the Planning Commission and Planning Department staff, and complicating the approval process for project sponsors. Surely, this is not the goal of this Task Force.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bridget Maley'.

Bridget Maley
Principal
City of San Francisco Certified Local Business #CMD082717018

J

Creating a Historic Preservation Commission

PROPONENT'S ARGUMENT IN FAVOR OF PROPOSITION J

HELP PRESERVE OUR WORLD-CLASS CITY. VOTE YES
ON J

As one of the world's most-beloved historic cities, it's time for San Franciscans to adopt world-class best practices that have protected the history and vitality of other great American cities. – that's why we need Proposition J.

ADOPTS BEST PRACTICES FROM AROUND THE
COUNTRY

San Francisco's preservation apparatus is more than forty years old, and needs serious reform. The body currently charged with preserving historic buildings has no final decision-making authority.

Proposition J adopts best practices and national standards of historic cities around the country – including New York, Boston, Chicago, and Philadelphia – that have independent preservation commissions with jurisdiction over historic buildings and neighborhoods.

STREAMLINES PERMITTING AND IMPROVES
EFFICIENCY

Proposition J streamlines the review of applications for changes to historic resources and helps prevent the demolition of the landmark buildings and neighborhood character that make San Francisco unique.

Proposition J was drafted collaboratively with the City's Planning Department, Mayor's Office, Landmarks Board, and the California Office of Historic Preservation. The result is a good government measure that provides clear guidance to homeowners, architects, and builders, and gives city staff the best tools available to make sound decisions about our historic buildings and neighborhoods.

PROMOTES ENVIRONMENTALLY SUSTAINABLE
DEVELOPMENT

Improving San Francisco's preservation efforts will also help the City meet its environmental goals. Supporting the preservation of existing historic structures conserves resources and prevents demolition debris from ending up in California landfills. Construction and demolition waste can comprise up to thirty percent of landfill content.

IT'S TIME FOR PROPOSITION J

It's time we bring San Francisco in line with other great cities by reforming the permitting process for historic buildings and giving an independent commission a voice on preservation issues.

San Francisco Architectural Heritage
National Trust for Historic Preservation
San Francisco Democratic Party
San Francisco Tomorrow

REBUTTAL TO PROPONENT'S ARGUMENT IN FAVOR OF PROPOSITION J

NO REBUTTAL TO PROPONENT'S ARGUMENT IN FAVOR OF PROPOSITION J WAS SUBMITTED

Arguments printed on this page are the opinion of the authors and have not been checked for accuracy by any official agency.
Arguments are printed as submitted. Spelling and grammatical errors have not been corrected.



Creating a Historic Preservation Commission

J

OPPONENT'S ARGUMENT AGAINST PROPOSITION J

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San Francisco Family Zoning Plan

HOUSING ELEMENT REZONING



**San Francisco
Planning**

Lisa Chen
Principal Planner

Mat Snyder
Senior Planner

Alex Westhoff
*Senior Preservation
Planner*

**HISTORIC PRESERVATION
COMMISSION**
AUGUST 20, 2025

TODAY'S PRESENTATION

- Introduced Legislation & Proposed Zoning Map (July 2025)
- Historic Preservation and Housing Production
- Related Topics & Next Steps



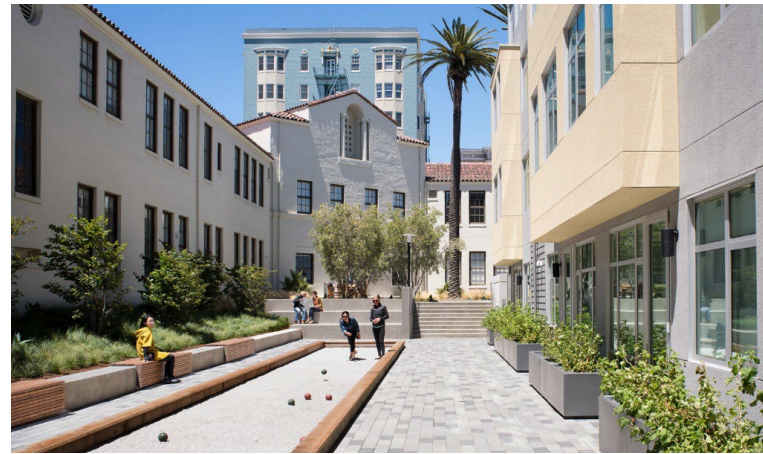
Aligning Housing Production and Historic Preservation

Preservation and housing production need not be competing goals—they are complementary strategies that, when aligned, can create more livable, inclusive, and rooted communities.

The Department is **strengthening its commitment** to preserving SF's cultural and architectural heritage through two programs:

- 1) **San Francisco Citywide Cultural Resources Survey (SF Survey)**
- 2) **Family Zoning Landmark Designations Program**

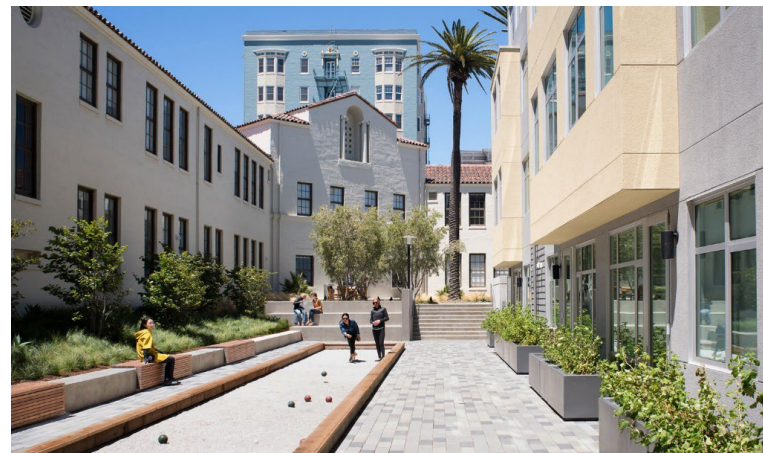
Images: BAR Architects



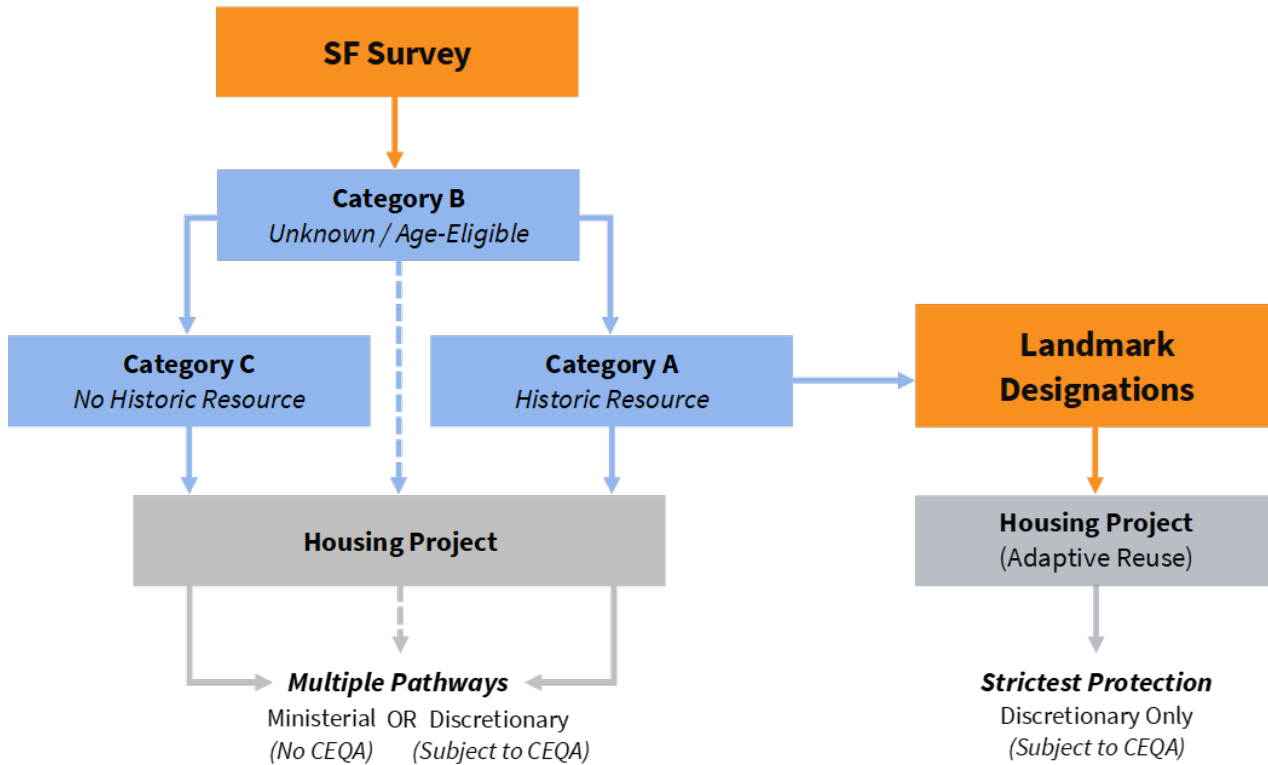
Preservation Strategies

- Local Program Eligibility: Listed properties **are not eligible for Local Program** (similar to State Programs)
- Historic Buildings are subject to review against the recently adopted **Preservation Design Standards**
- **Priority surveying & landmarking:** Properties that have fewer impediments to development (e.g. commercial buildings and single-family homes) are prioritized under SF Survey and the Family Zoning Landmarking Program
- **Adaptive reuse:** rethink how housing can breathe new life into historic resources

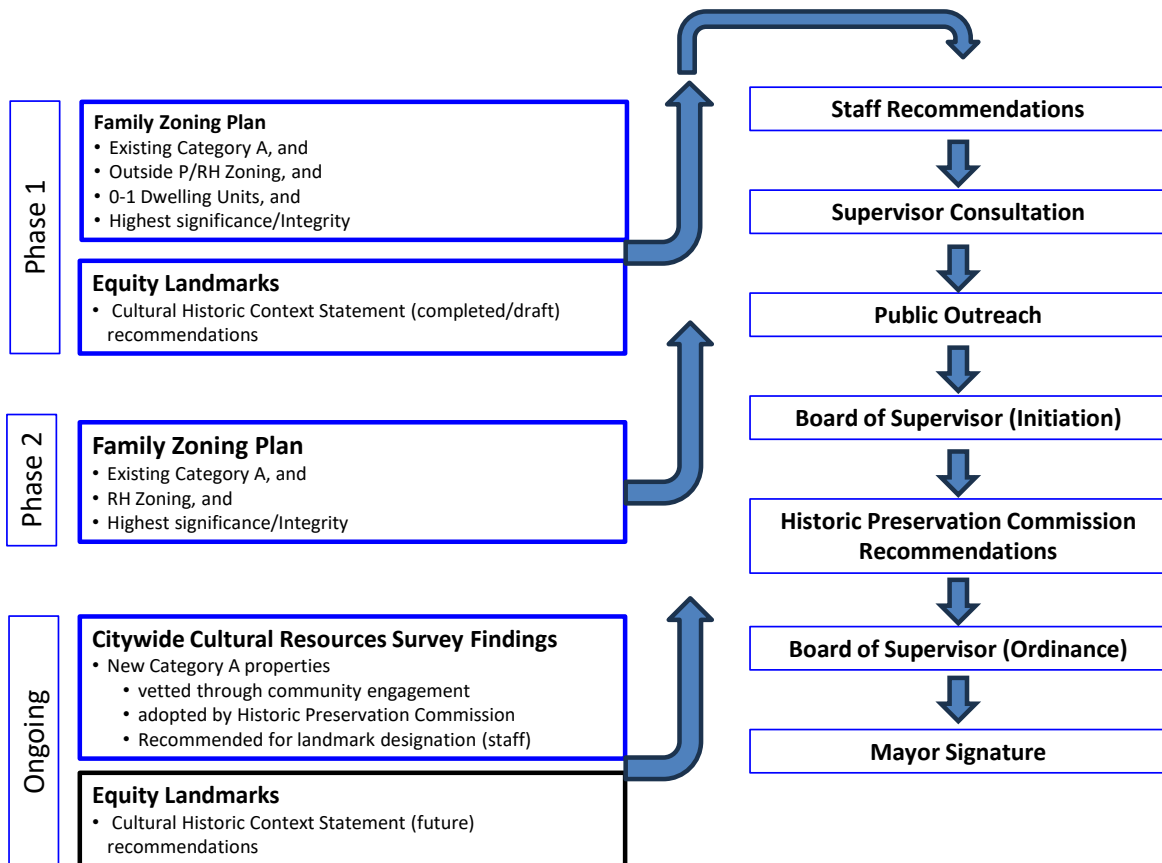
Images: BAR Architects



Aligning Historic Preservation and Housing Production



Family Zoning Plan | 24



San Francisco
Planning

Family Zoning Plan District 8 Proposed Landmarks



Thank you!



<http://sfplanning.org/rezoning-events>



sf.housing.choice@sfgov.org



Art by Michelle McNeil, Human Rights Commission



**WHEN I BECOME A SENIOR CITIZEN
I WANT TO BE ABLE TO STAY IN SF**